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**From:** Hong, Jeanhee [Hong.Jeanhee@epa.gov]  
**Sent:** 7/23/2019 4:14:35 PM  
**To:** Vanderspek, Sylvia@ARB [Sylvia.Vanderspek@arb.ca.gov]; Zorik Pirveysian [ZPirveysian@aqmd.gov]; Graham, AshleyR [Graham.AshleyR@epa.gov]; Tax, Wienke [Tax.Wienke@epa.gov]; Vagenas, Ginger [Vagenas.Ginger@epa.gov]; Sang-Mi Lee [slee@aqmd.gov]; Michael Krause [MKrause@aqmd.gov]; Sutkus, Carol@ARB [carol.sutkus@arb.ca.gov]; King, Scott@ARB [scott.king@arb.ca.gov]; Brehler, Pippin@ARB [Pippin.Brehler@arb.ca.gov]; Whitney, Daniel@ARB [daniel.whitney@arb.ca.gov]; Dyer, Wesley@ARB [wesley.dyer@carb.onmicrosoft.com]; Kalam Cheung [kcheung@aqmd.gov]; Lee, Anita [Lee.Anita@epa.gov]  
**Subject:** RE: South Coast 2012 PM2.5 - Cancelling Thursday's call; Status update?

Sylvia,

As we explained in the preamble to the PM2.5 SIP Requirements Rule, the purpose of the quantitative milestone requirement is to provide a means to evaluate progress toward attainment consistent with RFP (see, e.g., 81 FR 58010, 58064 (August 24, 2016)). Accordingly, the PM2.5 SIP Requirements Rule states (at 40 CFR section 51.1012(a)) that each RFP plan shall include, among other things:

- (2) "RFP projected emissions for direct PM2.5 and all PM2.5 plan precursors *for each applicable milestone year*, based on the anticipated implementation schedule for control measures..."
- (3) "An analysis that presents the schedule of control measures and estimated emissions changes to be achieved *by each milestone year*, and that demonstrates that the control strategy will achieve reasonable progress toward attainment between the applicable base year and the attainment year," and
- (4) "An analysis that demonstrates that by the end of the calendar year *for each milestone date for the area determined in accordance with [section] 51.1013(a)*, pollutant emissions will be at levels that reflect either generally linear progress or stepwise progress in reducing emissions on an annual basis between the base year and the attainment year...."

40 CFR 51.1012(a) (emphases added).

For all Moderate PM2.5 nonattainment areas and for Serious PM2.5 nonattainment areas that either demonstrate that timely attainment is impracticable or fail to attain, the quantitative milestone element of the attainment plan must address one milestone date that falls within 3 years *after* the applicable attainment date for the area (see 40 CFR 51.1013(a)(1)(i), (a)(2)(ii), (a)(3), and (a)(4)). The purpose of this "post-attainment year" quantitative milestone requirement is discussed in the preamble to the PM2.5 SIP Requirements Rule, at 81 FR 58010, 58063-64 and 58091 (August 24, 2016). For a Serious PM2.5 nonattainment area that demonstrates attainment by the end of the tenth calendar year after designation, however, the rule does not require this post-attainment year quantitative milestone -- instead, it requires quantitative milestones "to be achieved no later than milestone dates of 7.5 years and 10.5 years, respectively, from the date of designation of the area" (40 CFR 51.1013(a)(2)(i)). Because EPA designated the South Coast area nonattainment for the 2012 PM2.5 NAAQS effective April 15, 2015, the milestone dates required under section 51.1013(a)(2)(i) are **October 15, 2022** and **October 15, 2025**. Thus, under the PM2.5 SIP Requirements Rule, both the RFP and quantitative milestone elements of South Coast's Serious area plan for the 2012 PM2.5 NAAQS must address these two milestone dates. If EPA determines that the area has failed to attain by the Serious area attainment date, the State would be required to submit, within 1 year after the attainment date, a section 189(d) plan including a 5% plan and quantitative milestones consistent with RFP for subsequent years (see 40 CFR 51.1013(a)(3)(i)).

We had previously advised that the RFP and quantitative milestone elements of South Coast's Serious area plan for the 2012 PM2.5 NAAQS would need to also address a 2028 milestone date, but on a closer read of our regulations and preamble, we realized that this particular plan falls under the one exception to the post-attainment year quantitative milestone requirement in 40 CFR 51.1013(a)(2)(i). Apologies for the error on our part.

Please let us know if you'd like further clarification. Thanks much.

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Jeanhee Hong  
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**From:** Vanderspek, Sylvia@ARB <Sylvia.Vanderspek@arb.ca.gov>

**Sent:** Wednesday, July 17, 2019 1:59 PM

**To:** Zorik Pirveysian <ZPirveysian@aqmd.gov>; Graham, AshleyR <Graham.AshleyR@epa.gov>; Tax, Wienke <Tax.Wienke@epa.gov>; Hong, Jeanhee <Hong.Jeanhee@epa.gov>; Vagenas, Ginger <Vagenas.Ginger@epa.gov>; Sang-Mi Lee <slee@aqmd.gov>; Michael Krause <MKrause@aqmd.gov>; Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>; King, Scott@ARB <scott.king@arb.ca.gov>; Brehler, Pippin@ARB <Pippin.Brehler@arb.ca.gov>; Whitney, Daniel@ARB <daniel.whitney@arb.ca.gov>; Dyer, Wesley@ARB <wesley.dyer@carb.onmicrosoft.com>; Kalam Cheung <kcheung@aqmd.gov>; Lee, Anita <Lee.Anita@epa.gov>

**Subject:** RE: South Coast 2012 PM2.5 - Cancelling Thursday's call; Status update?

Hi Ashley

I have some questions on RFP for 2028 for the 12 ug/m3 PM2.5 standard.

Clean Air Act Section 171 (1) states that RFP means annual incremental reductions for the purpose of ensuring attainment of the standard by the **attainment date**. For milestones, the CAA differentiates by stating they are required until the area is redesignated. So, I understand the need for a 2028 milestone. However, I don't understand where it requires RFP for 2028. In fact, for the SJV PM2.5 SIP, it specifically states that 2028 RFP is not required.

Can you point me to the reference in the Act or the PM2.5 Implementation Rule where this 2028 RFP is required.

Thanks

Sylvia

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**From:** Zorik Pirveysian <ZPirveysian@aqmd.gov>

**Sent:** Friday, July 12, 2019 4:26 PM

**To:** Graham, AshleyR <Graham.AshleyR@epa.gov>; Tax, Wienke <Tax.Wienke@epa.gov>; Hong, Jeanhee <Hong.Jeanhee@epa.gov>; Vagenas, Ginger <Vagenas.Ginger@epa.gov>; Sang-Mi Lee <slee@aqmd.gov>; Michael Krause <MKrause@aqmd.gov>; Vanderspek, Sylvia@ARB <Sylvia.Vanderspek@arb.ca.gov>; Sutkus, Carol@ARB <carol.sutkus@arb.ca.gov>; King, Scott@ARB <scott.king@arb.ca.gov>; Brehler, Pippin@ARB <Pippin.Brehler@arb.ca.gov>; Whitney, Daniel@ARB <daniel.whitney@arb.ca.gov>; Dyer, Wesley@ARB <wesley.dyer@carb.onmicrosoft.com>; Kalam Cheung <kcheung@aqmd.gov>

**Subject:** RE: South Coast 2012 PM2.5 - Cancelling Thursday's call; Status update?

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hi Ashley,

Our apologies but we have been delayed in providing responses to your questions due to other urgent obligations (e.g., ports/airports MOUs, contingency measure, etc.), vacation/holiday schedules and pulling and validating data before sending them to you. We hope to have the responses by our next meeting on 7/25.

Please call me if you have any questions.

Regards,

Zorik

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**From:** Graham, AshleyR [mailto:[Graham.AshleyR@epa.gov](mailto:Graham.AshleyR@epa.gov)]

**Sent:** Wednesday, July 10, 2019 10:56 AM

**To:** Tax, Wienke <[Tax.Wienke@epa.gov](mailto:Tax.Wienke@epa.gov)>; Hong, Jeanhee <[Hong.Jeanhee@epa.gov](mailto:Hong.Jeanhee@epa.gov)>; Vagenas, Ginger <[Vagenas.Ginger@epa.gov](mailto:Vagenas.Ginger@epa.gov)>; Zorik Pirveysian <[ZPirveysian@aqmd.gov](mailto:ZPirveysian@aqmd.gov)>; Sang-Mi Lee <[slee@aqmd.gov](mailto:slee@aqmd.gov)>; Michael Krause <[MKrause@aqmd.gov](mailto:MKrause@aqmd.gov)>; Sylvia.Vanderspek@arb.ca.gov; carol.sutkus@arb.ca.gov; King, Scott@ARB <[scott.king@arb.ca.gov](mailto:scott.king@arb.ca.gov)>; Pippin.Brehler@arb.ca.gov; daniel.whitney@arb.ca.gov; wesley.dyer@arb.ca.gov

**Subject:** South Coast 2012 PM2.5 - Cancelling Thursday's call; Status update?

Hi everyone,

Just wanted to give folks a heads up that we are going to cancel the SCAQMD-CARB-EPA call on the South Coast 2012 PM2.5 plan that was scheduled for tomorrow (July 11) due to a lack of agenda items and schedule conflicts related to jury duty.

When we last spoke on June 20, it sounded like SCAQMD was almost ready to share some supplemental information that addresses the questions we posed during our May 10 call (see attached meeting materials from the May 10 call and summary of our questions below). I'm still catching up on email after being away but I don't believe we received anything just yet. Can SCAQMD provide an update on the anticipated timing for sharing the additional information? Our next call is scheduled for Thursday July 25 and it would be great to have the materials before that call so we can discuss any questions we might have and keep things moving forward.

Also, FYI, I am planning to extend the bi-weekly meeting recurrence into August/September here shortly so we can continue to follow up on an as needed basis.

Thanks,  
Ashley

Please provide the following information for PM2.5 and precursors (NOx, VOC, SO2, NH3):

1. Clarify measures (baseline and new) and reductions relied upon to meet RFP through 2028
2. Extend Table VI-C-5A to show RFP/attainment targets through 2028 QM
3. Specify what rules are associated with which control measures and provide the status/timeline of rule development/adoption
4. Provide an implementation schedule for SCAQMD adoption of rules for RFP per milestone/attainment year (2019, 2022, 2025, 2028) as you did for the 2006 PM2.5 NAAQS in Table VI-C-4.

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